

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

JONATHAN S. ABADY  
MATTHEW D. BRINCKERHOFF  
ANDREW G. CELLI, JR.  
RICHARD D. EMERY  
DEBRA L. GREENBERGER  
DIANE L. HOUK  
DANIEL J. KORNSTEIN  
JULIA P. KUAN  
HAL R. LIEBERMAN  
ILANN M. MAAZEL  
KATHERINE ROSENFELD  
ZOE SALZMAN  
SAM SHAPIRO  
EARL S. WARD  
O. ANDREW F. WILSON

ATTORNEYS AT LAW  
600 FIFTH AVENUE AT ROCKEFELLER CENTER  
10<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10020

TEL: (212) 763-5000  
FAX: (212) 763-5001  
www.ecbawm.com

VASUDHA TALLA  
ERIC ABRAMS  
DAVID BERMAN  
NICK BOURLAND  
DANIEL M. EISENBERG  
SARA LUZ ESTELA  
SARAH MAC DOUGALL  
SANA MAYAT  
HARVEY PRAGER  
VIVAKE PRASAD  
MAX SELVER  
EMILY K. WANGER

August 4, 2023

*Via ECF*

Hon. Vernon S. Broderick, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

*Re: Goidel et al. v. Aetna Life Insurance Co., No. 21-cv-7619*

Your Honor:

The Court previously stayed all deadlines to allow the parties to focus on settlement. Dkt. No. 60. We write today with the required joint status report. Settlement discussions are continuing and the parties respectfully request an additional stay until September 8, 2023, at which time we will file another joint status report either (1) requesting an additional stay to continue settlement discussions or (2) proposing a new Case Management Plan and Scheduling Order to reset all briefing and discovery deadlines. The parties further agree that Plaintiffs shall not be prejudiced by this stay, including that Defendant shall not raise any arguments in opposition to class certification that would not have been available to them on June 30, 2023.

The parties respectfully ask the Court to so order this request.

Sincerely,

/s/  
EMERY CELLI BRINCKERHOFF  
ABADY WARD & MAAZEL LLP  
Zoe Salzman  
Debra Greenberger  
Eric Abrams  
600 Fifth Avenue, 10<sup>th</sup> Floor

/s/  
BAKER BOTTS LLP  
Earl B. Austin  
Sarah Reeves  
30 Rockefeller Plaza  
New York, New York 10112  
(212) 408-2500

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

Page 2

New York, New York 10020  
(212) 763-5000


NATIONAL WOMEN'S LAW  
CENTER  
Sunu Chandy  
Michelle Banker  
Alison Tanner\*  
Noel R. León  
1350 I Street NW, Suite 700  
Washington DC 20005  
(202) 588-5180

*Attorneys for Plaintiffs*

\*Admitted *pro hac vice*

CALCAGNI & KANEFSKY LLP  
Mariellen Dugan  
One Newark Center  
1085 Raymond Blvd, 14<sup>th</sup> Floor  
Newark, New Jersey 07102

*Attorneys for Defendant*

**APPLICATION GRANTED**  
**SO ORDERED**   
**VERNON S. BRODERICK**  
**U.S.D.J.** 08/21/2023

This action is hereby STAYED until September 8, 2023.  
The parties shall provide an update on the status of  
settlement discussions by September 8, 2023.